

EXHIBIT 7

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CLYDE RAY SPENCER, MATTHEW RAY
SPENCER and KATHRYN E. TETZ,

Plaintiffs,

v.

No. 11-5424 BHS

FORMER DEPUTY PROSECUTING ATTORNEY FOR)
CLARK COUNTY JAMES M. PETERS, DETECTIVE)
SHARON KRAUSE, SERGEANT MICHAEL)
DAVIDSON, CLARK COUNTY PROSECUTOR'S)
OFFICE, CLARK COUNTY SHERIFF'S OFFICE,)
THE COUNTY OF CLARK, SHIRLEY SPENCER)
and JOHN DOES ONE through TEN,)

Defendants.)

DEPOSITION UPON ORAL EXAMINATION OF
MATTHEW RAY SPENCER

Tuesday, November 13, 2012
10:00 a.m.
1201 Third Avenue, Suite 2200
Seattle, Washington

Reported by Marlis J. DeJongh, CCR, RPR

Lic. No. DE-JO-NM-J498K9

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APPEARANCES

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Court Reporter: MARLIS J. DeJONGH, CCR, RPR
1400 Hubbell, Suite 1510
Seattle, Washington 98101

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MATTHEW RAY SPENCER, deponent herein, being first duly
sworn on oath, was examined and
testified as follows:

EXAMINATION

BY MR. BOGDANOVICH:

Q. Would you state your full name and spell your last
name, please.

A. Matthew Spencer, M-a-t-t-h-e-w, Ray, R-a-y,
Spencer, S-p-e-n-c-e-r.

Q. Mr. Spencer, have you ever had your deposition
taken before?

A. I've never had a deposition. I've only made
testimony in court.

Q. Are you referring to the occasion when you appeared
in court in July 2009 in connection with a hearing about
your recantation of statements that you had made about abuse
by your father?

A. Correct.

Q. I want to mention a few things about the deposition
procedure to ask you to keep in mind today.

Obviously there is a verbatim record being made, so one
of the things I need to ask you to do is make sure and wait
until I finish my question before you start your answer, and
I will try to do the same thing, wait for you to completely

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finish your answer before I start my next question so that
we don't end up with two people talking at once. That
becomes very difficult for our court reporter to transcribe.
Okay?

A. Okay.

Q. Also I need you to answer audibly, whether that's
yes, no, or whatever words are necessary, rather than
shaking your head or nodding, because, again, I can see that
across the table and understand what you're communicating to
me but it doesn't come out on a written record. So if you
can try to remember to answer audibly, I would appreciate
it, okay?

A. Okay.

Q. Also if I ask any questions that you don't
understand or are confusing to you for any reason, let me
know that and I'll see if I can figure out a way I can
rephrase it to make sure that you're answering the question
that I'm intending you to answer. Okay?

A. Okay.

Q. If you need to take a break at any time, let me
know and we can do that. The only condition on that is that
you can't ask for a break if there's been a question posed
to you. You need to answer a question first and then let me
know if you need the break. All right?

A. All right.

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1 she ask you more than once or just once?
 2 A. Maybe on more than one occasion.
 3 Q. Did your mother after that first interview with
 4 Detective Krause, did she tell you anything about what
 5 Kathryn had said about whether she had been molested or
 6 touched inappropriately by your father?
 7 A. I believe that's when I was informed, my dad needs
 8 help, my sister had been molested.
 9 Q. And that's something you were told by your mother?
 10 A. Correct, and Detective Krause.
 11 Q. Well, and I want to focus on your mother right now
 12 for these questions.
 13 Did she give you any more specifics than what you've
 14 just described?
 15 A. No.
 16 Q. Was that the only time you talked to Detective
 17 Krause?
 18 A. I believe so, in Sacramento.
 19 Q. Was there another occasion somewhere other than
 20 Sacramento where you again talked to Detective Krause about
 21 these issues?
 22 A. That was in Vancouver.
 23 Q. Do you remember how long after the first interview
 24 with Detective Krause the second one occurred?
 25 A. I can't recall. Could have been months.

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1 Q. And this first interview that's reported in
 2 Exhibit 1, we know that was mid October of '84. Do you
 3 recall if you and Kathryn had your annual Christmas two-week
 4 visit to your father that Christmas of '84?
 5 A. We did not go up there that Christmas.
 6 Q. Did you want to go there that Christmas?
 7 A. Yeah.
 8 Q. Did you ask your mom why you weren't going?
 9 A. Yes.
 10 Q. What did she say?
 11 A. Your father needs help, you can't go see him.
 12 Q. At any time between when you talked to Detective
 13 Flood up to the time we're talking about now right after
 14 this first interview with Detective Krause had you talked to
 15 your dad?
 16 A. I don't recall.
 17 Q. Do you think it's possible you did and you're not
 18 sure?
 19 A. I don't think I did.
 20 (Exhibit No. 2 marked for identification.)
 21 Q. Mr. Spencer, you have been handed what has been
 22 marked as Exhibit No. 2 to your deposition and I'm going to
 23 ask you to take whatever time you need to to review that.
 24 A. (Witness reviewing document.)
 25 Q. It looks like you've had a chance to finish your

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1 review of the document that's been marked as Exhibit 2. Is
 2 that correct?
 3 A. Correct.
 4 Q. Have you seen that document before?
 5 A. I have.
 6 Q. When did you first see this?
 7 A. I believe in the last couple of months.
 8 Q. Well, do you -- we talked about you having
 9 testified at a court hearing in July of 2009. Correct?
 10 A. Correct.
 11 Q. And you signed a declaration, a written declaration
 12 under penalty of perjury before that hearing in which you
 13 said that your father never molested you, correct?
 14 A. Correct.
 15 Q. Do you remember what year you signed that written
 16 declaration?
 17 A. Didn't you just say 2009?
 18 Q. 2009 was the year that you testified in the court
 19 hearing.
 20 A. I don't recall exactly. I believe that was the
 21 year before.
 22 Q. You recall signing the declaration before you went
 23 in and testified in that court hearing?
 24 A. I believe so.
 25 MR. BOGDANOVICH: Why don't we go ahead and get

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1 this marked right now.
 2 (Exhibit No. 3 marked for identification.)
 3 Q. I think it may be easier if we have you review that
 4 right now. Would you go ahead and review what is marked as
 5 Exhibit 3 and maybe we can refer to both of these as we
 6 continue our discussion.
 7 A. (Witness reviewing document.)
 8 Q. It appears you've finished your review of the
 9 document marked Exhibit 3?
 10 A. I have.
 11 Q. Does that appear to be an accurate copy of the
 12 declaration that you signed in which you indicated that you
 13 had not been abused by your father?
 14 A. Correct.
 15 Q. And that's your signature that appears on
 16 Page 5?
 17 A. Correct.
 18 Q. And it's dated February 27, 2006, correct?
 19 A. Correct.
 20 Q. And the reason I wanted to bring this up now, if
 21 you look at Page 4 of Exhibit 3, your declaration,
 22 Paragraph 18, you said in that declaration, I have had the
 23 opportunity to review the report written by Detective Krause
 24 concerning her March 24, 1985 interview with me. Do you see
 25 that statement?

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1 Victim Witness paid for it so I was able to go whenever
 2 needed.
 3 Q. Well, and did it start -- I think you said it
 4 started fairly soon after your father went to prison?
 5 A. Yeah.
 6 Q. And you were roughly nine still then?
 7 A. Correct.
 8 Q. And are you saying the therapy continued until
 9 about the time you turned 18?
 10 A. Yeah, but not consistently every week. After about
 11 13, then it tapered off and once every few months I would go
 12 see him.
 13 Q. How about from when you were nine until you were
 14 13, would you see him literally on average weekly?
 15 A. Yeah.
 16 Q. For how long each time?
 17 A. An hour.
 18 Q. Did you want to be having those sessions with
 19 Mr. Cooper at that time?
 20 A. No. I believe they were very unproductive.
 21 Q. Did you ever raise objections to going?
 22 A. All the time.
 23 Q. I think we talked a little bit, you said you acted
 24 out in school, had some discipline incidents. Was your
 25 behavior something that you discussed with Mr. Cooper?

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1 Q. Were you working while you were using at that
 2 frequency?
 3 A. Yes.
 4 Q. Did you discuss your methamphetamines use with
 5 Mr. Cooper?
 6 A. No. He was not in the picture. This was after
 7 him.
 8 Q. Did you pretty much stop seeing Mr. Cooper as soon
 9 as you turned 18?
 10 A. Yeah. It wasn't paid for anymore.
 11 Q. At any point did you obtain any treatment for your
 12 methamphetamine use?
 13 A. No.
 14 Q. At some point did you stop completely?
 15 A. Yeah. I'm stopped right now. I've been stopped
 16 for years.
 17 Q. When did you stop completely?
 18 A. I don't know, early 20s or so.
 19 MR. BOGDANOVICH: I am going to have a little more
 20 I want to pursue. Do you want to take a break now?
 21 Let's go off the record.
 22 (Recess taken at 12:30 p.m.)
 23
 24
 25

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1 A. Correct. Usually when I was in trouble that's when
 2 I had to go see him.
 3 Q. And I would assume that would be more the case,
 4 like you said, after you turned 13, got into the teenage
 5 years?
 6 A. Correct.
 7 Q. At some point you began using drugs, didn't you?
 8 A. Correct.
 9 Q. When was that? When did you start?
 10 A. 19. 18, 19.
 11 Q. And what drugs did you use?
 12 A. I had used methamphetamines.
 13 Q. Any others?
 14 A. No.
 15 Q. How often were you using methamphetamines when you
 16 first started?
 17 A. Every month or so, maybe once or twice.
 18 Q. And how would you use it?
 19 A. Snort it.
 20 Q. Did your use increase after a period of time?
 21 A. It had for a while.
 22 Q. To what frequencies?
 23 A. Maybe once every couple days.
 24 Q. How long did that go on?
 25 A. For a couple years.

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1 AFTERNOON SESSION
 2 (1:15 p.m.)
 3 (Exhibit No. 5 marked for identification.)
 4
 5 EXAMINATION (continued)
 6 BY MR. BOGDANOVICH:
 7 Q. We have taken our lunch break, Mr. Spencer. Are
 8 you ready to proceed?
 9 A. I am.
 10 Q. I'm going to show you what has been marked as
 11 Exhibit 5, and because of the size of this one I am not
 12 necessarily going to ask you to go through each and every
 13 page.
 14 I'm going to represent to you that Exhibit 5 is a copy
 15 of the transcript of the hearing that we had discussed a
 16 little bit earlier in your testimony today, the July 10,
 17 2009 hearing that's been referred to as the reference
 18 hearing regarding your recantation and your sister Kathryn's
 19 recantation.
 20 And what I have copied here is from the cover page. And
 21 they are numbered, you will see for reference, the page
 22 numbers appear near the top right corner.
 23 I have copied this transcript through Page 58, which is
 24 where your testimony ended, okay. And I will be referring
 25 to certain questions,

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1 Again, I don't want you to read through this 58 pages
2 right now but I will try to give you enough context for
3 specific questions that you will understand what the context
4 was. And if you need to look up or back a few questions,
5 I'll certainly allow you to do that.

6 Before we go any further I wanted to direct your
7 attention to the bottom of Page 14. And this is where you
8 were discussing the March 1985 interview by Detective
9 Krause.

10 And you see at Line 18 your attorney was questioning
11 you. It indicates at the top this was your direct
12 examination, not your attorney, your father's, Mr. Camiel.

13 Line 18 he asked you a question: When you had been
14 telling the detective that you had not been molested, did
15 the detective seem to accept your answer?

16 Answer: She never accepted a quote, no, end quote,
17 answer.

18 Question: How do you know that?

19 Answer: Because it wasn't until I said, quote, yes, end
20 quote, is when the questioning stopped.

21 And then there was this exchange. Question: When you
22 said, quote, yes, end quote, what did you tell the
23 detective?

24 And your answer: I told her that he had molested me and
25 my sister and my stepbrother and that there had been more

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1 reference hearing and it's been a different way today so I'm
2 just trying to find out when we walk out of here which
3 version are you going to swear to.

4 So did you tell Detective Krause in March of 1985 that
5 you and your sister and your stepbrother were molested by
6 your father?

7 A. She told me I was molested and I agreed to it.

8 Q. So the answer to my question is, yes, you did tell
9 her?

10 A. I agreed to it.

11 Q. And then also if you look at Page 29 of the
12 Exhibit 5 there was a question starting at Line 2. You were
13 asked, Question: You were interviewed by your father's
14 attorney Mr. Jim Rulli, weren't you?

15 Your answer: I believe so.

16 Question: Down in Sacramento.

17 Answer: I believe so.

18 Question: And you told Attorney Rulli that in fact you
19 had been abused.

20 Answer: I told everybody when I was nine that I had
21 been abused.

22 That's your testimony at that time, correct?

23 A. That's my testimony at that time.

24 Q. Now again today I think you specifically denied
25 ever having been interviewed by Mr. Rulli?

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1 than one individual involved and --

2 And then your answer was interrupted.

3 You were sworn to tell the truth during your testimony
4 at that July 10, 2009 hearing, correct?

5 A. Correct.

6 Q. And did you tell the truth that day?

7 A. I believe to the best of my ability.

8 Q. And today you were sworn to tell the truth again in
9 this deposition, correct?

10 A. Correct.

11 Q. And you testified earlier today, you specifically
12 denied a couple times that you had told Detective Krause
13 that your sister or your stepbrother had been molested.

14 So my question to you at this point is, which is true,
15 did you or did you not tell Detective Krause that your
16 sister and stepbrother had also been molested by your
17 father?

18 A. Detective Krause told me that my sister and
19 stepbrother had been molested. I went along with it.

20 Q. So your answer now is, yes, you did tell Detective
21 Krause in March 1985 that not just you but also your sister
22 and stepbrother had been molested by your father?

23 A. She informed me that they had been molested.

24 Q. That's not my question. I want to get to the point
25 here. Is your testimony now, and it was one way in the

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1 A. I don't remember Jim Rulli being there. I'm not
2 saying that didn't happen. I just don't recall. I recall
3 Jim Peters.

4 Q. Does seeing your sworn testimony in this
5 July 10, 2009 proceeding now refresh your recollection that
6 you did in fact get interviewed by Mr. Rulli?

7 A. I don't recall being interviewed by Mr. Rulli. I'm
8 not saying it didn't happen but I don't recall that
9 conversation.

10 Q. And as we sit here you can't say one way or another
11 whether you told Mr. Rulli that you had been abused?

12 A. I'm not saying I didn't but I don't remember.

13 Q. I'm trying to remember where we left off. I think
14 you had explained to me your methamphetamine use period, and
15 I think you had just said you had stopped completely using
16 methamphetamine by your early 20s?

17 A. Uh-huh.

18 Q. That was around the time you were 18 and 19 when
19 you were using fairly regularly you said, right?

20 A. Pretty regularly.

21 Q. I want to kind of try to fast-forward here, if I
22 can, to the time period around when you provided this
23 declaration dated February 27, 2006.

24 You've told me about the two occasions where Mr. Camiel
25 and someone with him on the second occasion tried to contact

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1 A. Not at that time, no.
 2 Q. Just kind of explain to me what happened from
 3 there?
 4 A. We communicated through e-mail and probably a few
 5 months later I came up here.
 6 Q. During those few months did you communicate at all
 7 with Mr. Camiel or anyone from his office?
 8 A. No.
 9 Q. How did you get up -- when you say up here, where
 10 was your father living at that time?
 11 A. Renton.
 12 Q. And you flew up to SeaTac?
 13 A. Correct.
 14 Q. How did you get to SeaTac?
 15 A. Airplane.
 16 Q. Who purchased the plane ticket?
 17 A. My father.
 18 Q. Did anyone else come up with you?
 19 A. No.
 20 Q. What happened when you got to the SeaTac airport?
 21 A. My father picked me up and we went to his
 22 apartment.
 23 Q. What did you do there?
 24 A. Talked and talked and talked.
 25 Q. Did the subject of whether he had molested you come

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1 up?
 2 A. We left that alone for a while. We didn't talk
 3 about that.
 4 Q. How long did you stay at his apartment that day
 5 that he picked you up?
 6 A. I stayed there for, I believe, two days.
 7 Q. Did the two of you -- was anyone else there with
 8 him?
 9 A. No.
 10 Q. Did the two of you go anywhere or did you just stay
 11 at the apartment for the two days?
 12 A. He couldn't really go anywhere. He was on house
 13 arrest.
 14 Q. What happened after the end of the couple of days?
 15 A. I informed him that I'm up here to make a
 16 declaration, I'm up here to recant my statements.
 17 Q. And when you use the words, I'm up here to make a
 18 declaration, by the end of two days at your father's
 19 apartment in Renton had you communicated with Mr. Camiel?
 20 A. At the second day.
 21 Q. And did you call him or did he call you?
 22 A. My father called him.
 23 Q. And what did your father tell him, if you heard?
 24 A. I didn't hear the conversation.
 25 Q. Do you have any understanding of what your father

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1 told Mr. Camiel?
 2 A. Apparently it's, Matthew wants to recant his
 3 statements.
 4 Q. And then did you meet with Mr. Camiel on that same
 5 trip up to Renton?
 6 A. I believe so.
 7 Q. Where did you meet with him?
 8 A. Seattle.
 9 Q. At his office?
 10 A. Correct.
 11 Q. Did your father go with you?
 12 A. Yes.
 13 Q. Did anyone else accompany the two of you?
 14 A. No.
 15 Q. What happened at Mr. Camiel's office?
 16 A. I filed an official report, declaration, began
 17 that. I believe it's where this is drafted.
 18 Q. When you say this, you're referring to the
 19 declaration of Matthew Ray Spencer we've marked as
 20 Exhibit 3?
 21 A. Correct.
 22 Q. Who typed it up?
 23 A. Peter's office.
 24 Q. Was it Mr. Camiel or somebody else at his office?
 25 A. I didn't see it.

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1 Q. Was it handed to you in this form that we see it
 2 marked here as Exhibit 3?
 3 A. I believe so.
 4 Q. Do you know how Mr. Camiel's office came up with
 5 the content?
 6 A. Came up through me.
 7 Q. Just explain to me how this was drafted?
 8 A. I came in, gave an interview, and they typed it up.
 9 Q. And does this declaration accurately reflect the
 10 content of the statements you made to Mr. Camiel that day?
 11 A. Most of it is.
 12 Q. When you say most of it, are there parts that you
 13 don't feel are accurate?
 14 A. Yeah, Paragraph 18, While I believe that I did tell
 15 her the things written in the report attributed to me about
 16 my father sexually abusing me, none of it is true.
 17 When it comes to that, I went along with what she had
 18 told me had happened to me. There wasn't anything that I
 19 had generated on my own except for after that maybe the
 20 details of maybe a couple of things, the yellow sweater, red
 21 Porsche. Other than that I went along with what she told me
 22 to say.
 23 Q. Well, do you now think that this, the statement
 24 that you just read, the second sentence in Paragraph 18 is
 25 not accurate?

REPORTER'S CERTIFICATE

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, MARLIS J. DeJONGH, CCR, RPR, a Notary Public in
and for the State of Washington, do hereby certify:

That prior to being examined, the witness named in the
foregoing deposition was duly sworn to testify the truth,
the whole truth and nothing but the truth;

That said deposition was taken down by me in
shorthand at the time and place therein named and thereafter
transcribed by means of computer-aided transcription, and
that the foregoing transcript contains a full, true and
verbatim record of the said deposition;

I further certify that I have no interest in the
event of the action.

WITNESS my hand and seal this 29th day of November,
2012.

Notary Public in and for the State
of Washington, residing in Seattle.
My commission expires 01/2016.
Lic. No. DE-JO-NM-J498K9

DECLARATION OF MATTHEW SPENCER

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CLARK COUNTY SUPERIOR COURT FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON

VS.

No. 85-2-00007-2

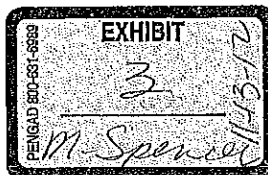
CLYDE RAY SPENCER

DECLARATION OF MATTHEW RAY
SPENCER

I, MATTHEW RAY SPENCER DECLARE UNDER PENALTY OF PERJURY UNDER
THE LAWS OF THE STATE OF WASHINGTON AND THE UNITED STATES THAT THE
FOLLOWING FACTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

1. I AM THE SON OF CLYDE RAY SPENCER WHO WAS CONVICTED IN 1985
IN CLARK COUNTY WASHINGTON OF HAVNG SEXUALLY ABUSED ME, MY
SISTER KATHRYN AND MY STEPBROTHER MATT HANSEN.
2. I CURRENTLY RESIDE IN CALIFORNIA AND WORK AS AN AUTOMOTIVE
TECHNICIAN. I HAVE HAD TWO YEARS OF COLLEGE.
3. IN 1985 I WAS NINE YEARS OLD. MY DATE OF BIRTH IS NOVEMBER
28, 1975.

DECLARATION OF MATTHEW SPENCER
1



Mair & Camiel, P.S.
710 Cherry Street
Seattle, WA 98104
Phone: 206-624-1551
Facsimile: 206-623-5951

DECLARATION OF MATTHEW SPENCER

1 4. I AM NOW 30 YEARS OLD AN I AM MAKING THIS DECLARATION OF MY
2 OWN FREE WILL WITHOUT ANY THREAT, PROMISE, INCUCEMENT OR
3 PRESSURE PUT UPON ME.

4 5. IN 1984 I LIVED WITH MY MOTHER AND SISTER IN CALIFORNIA. MY
5 FATHER LIVED IN THE STATE OF WASHINGTON. MY SISTER AND I
6 CAME TO VISIT DURING THE SUMMER.

7 6. I HAVE HAD NO CONTACT WITH MY FATHER, CLYDE RAY SPENCER OR
8 HIS ATTORNEY OR INVESTIGATOR SINCE 1984, ALTHOUGH I AM AWARE
9 OF THE FACT THAT OVER THE YEARS THE ATTORNEY WORKING FOR MY
10 FATHER HAS ATTEMPTED TO CONTACT ME AND THAT MY FATHER WROTE
11 LETTERS AND SENT CHRISTMAS GIFTS.

12 7. I AM AWARE THAT OVER THE YEARS MY MOTHER OBJECTED TO MY
13 BEING INTERIVEWED BY MY FATHER'S ATTORNEY OR INVESTIGATOR
14 AND TOLD THEM NOT TO CONTACT ME.

15 8. IN 2005 I LEARNED THAT MY FATHER HAD BEEN RELEASED FROM
16 PRISON AFTER SERVING OVER 20 YEARS.

17 9. THE FIRST CONTACT I HAVE HAD WITH MY FATHER WAS THROUGH A
18 NEWSPAPER REPORTER, KEN OLSON FROM THE VANCOUVER COLUMBIAN
19 WHO TOLD ME HE WAS WRITING AN ARTICLE ABOUT MY FATHER'S CASE
20 AND WANTED TO INTEVIEW ME. AT THE TIME THAT THE REPORTER
21 CONTACTED ME IN ABOUT SEPTEMBER OF 2005 I TOLD THE REPORTER
22 I WANTED TO COME TO SEATTLE TO MEET WITH MY FATHER.
23
24
25

DECLARATION OF MATTHEW SPENCER
2

Mair & Camiel, P.S.
710 Cherry Street
Seattle, WA 98104
Phone: 206-624-1551
Facsimile: 206-623-5951

DECLARATION OF MATTHEW SPENCER

1 10. IN LATE 2005 MY FATHER SENT ME AN E-MAIL AND WE EXCHANGED E-
2 MAI LS THAT LED TO MY VISITING WITH HIM IN SEATTLE FOR THE
3 FIRST TIME IN LATE FEBRUARY 2006.

4 11. THIS VISIT WAS THE FIRST TIME I HAVE SEEN MY FATHER SINCE
5 1984 AND THE FIRST TIME I HAVE EVER TALKED TO HIM ABOUT THE
6 CRIMINAL CHARGES.

7 12. I UNDERSTAND THAT MY FATHER WAS ACCUSED OF SEXUALLY
8 MOLESTING ME AND MY SISTER AND MY STEPBROTHER. I ALSO KNOW
9 THAT HE PLEADED GUILTY TO THOSE CRIMINAL CHARGES AND
10 RECEIVED A LIFE SENTENCE.

11 13. I CAN STATE UNEQUIVOCALLY THAT I WAS NEVER MOLESTED IN ANY
12 MANNER AT ANY TME BY MY FATHER.

13 14. I RECALL THAT IN 1985 I WAS INTERVIEWED BY A DETECTIVE AT
14 MY HOME. HE ASKED ME IF MY FATHER HAD TOUCHED ME
15 IMPROPERLY. I REMEMBER I TOLD THE DETECTIVE THAT I HAD NOT
16 BEEN TOUCHED BY MY FATHER IN ANY INAPPROPRIATE WAY.

17
18 15. I KNOW THAT I WAS INTERVIEWED BY A FEMALE DETECTIVE. I
19 REMEMBER DETECTIVE KRAUSE BY NAME. SHE WAS INVESTIGATING
20 THE ALLEGATIONS IN 1984 OR 1985 AND CAME DOWN TO CALIFORNIA
21 TO INTERVIEW ME AND MY SISTER. SHE DROVE ME AND MY SISTER
22 AROUND AND TOOK US TO HER MOTEL. SHE REPEATEDLY ASKED ME IF
23 MY FATHER HAD MOLESTED ME. SHE TOLD ME THAT MY SISTER AND
24 LITTLE MATT HAD ADMITTED THAT HE HAD MOLESTED THEM.

25 DECLARATION OF MATTHEW SPENCER

DECLARATION OF MATTHEW SPENCER

1
2 16. I KEPT TELLING HER HE DIDN'T DO ANYTHING. SHE WOULDN'T
3 ACCEPT MY DENIALS AND KEPT SUGGESTING THAT HE HAD MOLESTED
4 ME AND THAT I WASN'T BEING TRUTHFUL.
5

6 17. FINALLY I FIGURED THAT IF MY FATHER HAD MOLESTED MY SISTER
7 AND LITTLE MATT THAT MAYBE HE HAD MOLESTED ME AS WELL SO I
8 TOLD HER THAT HE HAD. I MADE UP SPECIFIC DETAILS OF WHAT
9 MY FATHER DID BASED ON WHAT THE DETECTIVE ASKED ME. NONE OF
10 THIS WAS TRUE.
11

12 18. I HAVE HAD THE OPPORTUNIT TO REVIEW THE REPORT WRITTEN BY
13 DETECTIVE KRAUSE CONCERNING HER MARCH 24, 1985 INTERVIEW
14 WITH ME. WHILE I BELIEVE THAT I DID TELL HER THE THINGS
15 WRITTEN IN THE REPORT ATTRIBUTED TO ME ABOUT MY FATHER
16 SEXUALLY ABUSING ME NONE OF IT IS TRUE.
17

18 19. LATER I WAS FLOWN UP TO WASHINGTON FOR ANOTHER INTERVIEW. I
19 RECALL I MADE UP STORIES OF OTHER POLICE OFFICERS ALONG WITH
20 MY FATHER BEING INVOLVED IN ABUSING ME, LITTLE MATT AND
21 KATHRYN AND SOMEONE DRIVING A RED PORSCHE. NONE OF THIS
22 WAS TRUE.
23
24
25

DECLARATION OF MATTHEW SPENCER

4

Mair & Camiel, P.S.
710 Cherry Street
Seattle, WA 98104
Phone: 206-624-1551
Facsimile: 206-623-5951

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20. I NEVER OBSERVED MY FATHER HAVE ANY SEXUAL CONTACT WITH MY
SISTER OR STEPBROTHER, MATT HANSEN, NOR DID EITHER ONE OF
THEM EVER TELL ME THAT HE DID SO.

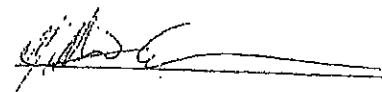
21. OVER THE YEARS I HAVE TALKED WITH MY SISTER KATHRYN. SHE HAS
TOLD ME THAT SHE MUST HAVE BLOCKED OUT THE ABUSE BY MY
FATHER BECAUSE SHE HAS NO MEMORY OF HAVING BEEN ABUSED BY
HIM.

22. OVER THE YEARS I HAVE ALWAYS WANTED TO COME FORWARD AND MAKE
CLEAR THAT MY FATHER HAD NOT SEXUALLY ABUSED ME, BUT I HAVE
NOT KNOWN HOW TO GO ABOUT SETTING THE RECORD STRAIGHT.

23. ON FEBRUARY 27TH, 2006 I MET WITH MY FATHER'S LAWYER, PETER
A. CAMIEL IN SEATTLE AND TOLD HIM ALL OF THE ABOVE FACTS.

24. I HAVE CAREFULLY REVIEWED EVERY LINE OF THIS DECLARATION FOR
ACCURACY. IT IS ALL TRUE TO THE BEST OF MY KNOWLEDGE AND I
AM WILLING TO GO TO COURT AND SWEAR TO THESE FACTS BEFORE A
JUDGE.

DATED THIS 27TH DAY OF FEBRUARY, 2006 AT SEATTLE, WASHINGTON



MATTHEW RAY SPENCER

DECLARATION OF MATTHEW SPENCER